

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

Case No.: 3:24-cv-00277-KDB-DCK

DENNIS HANSCOM, on behalf of
himself and all others similarly
situated,

Plaintiffs,

v.

**MOTION FOR EXTENSION
OF TIME TO RESPOND TO
MOTION TO DISMISS**

**NORDSEC LTD., NORDSEC B.V.,
NORDVPN S.A., NORD
SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,**

Defendants.

Dennis Hanscom individually and on behalf all others similarly situated (“Plaintiff”), pursuant to Local Rule 7.1 and Rules 6 and 16 of the Federal Rules of Civil Procedure respectfully move the Court for an Order extending the time for Plaintiff to file a Response to Defendants’ Motion to Dismiss Plaintiff’s Amended Complaint [DE 54], and in support hereof, Plaintiff respectfully shows:

1. Plaintiff commenced this action against Defendants on March 5, 2024 and filed an Amended Complaint on July 31, 2024.
2. On August 21, 2024 Defendants filed a Motion to Dismiss the Amended Complaint. [DE 54].

3. Plaintiff's response is currently due on September 4, 2024.
4. The time for performance has not yet expired.
5. Plaintiff requests an additional 14 days, up to and including September 18, 2024 to respond to Defendants' Motion to Dismiss due to the upcoming holiday as well obligations in other matters.
6. Counsel for Defendants have been asked if they consent to this requested extension, and they do not oppose this request.
7. This is Plaintiff's first request for an extension of time to respond to Defendants' Motion to Dismiss the Amended Complaint.
8. Plaintiff's Motion is not interposed for the improper purpose of undue delay.

WHEREFORE, Plaintiff respectfully requests the Court grant Plaintiff's Motion for Extension of Time to Respond to Defendants' Motion to Dismiss the Amended Complaint up to and including September 18, 2024.

Date: August 27, 2024

By: Scott C. Harris

Scott Harris

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